

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:19-CR-209

vs.

Hon. Janet T. Neff
U.S. District Judge

MELVIN JAMES HARRIS,
a/k/a "Malvin James Harris,"
a/k/a "Doo,"
VANESSA LOUISE HUNTER, and
COREY JOHN RAPHAEL,

**THIRD SUPERSEDING
INDICTMENT**

Defendants.

_____ /

The Grand Jury charges:

COUNT 1

(Distribution of a Controlled Substance)

On or about August 14, 2019, in Leelanau County, in the Southern Division of the Western
District of Michigan, the defendant,

**MELVIN JAMES HARRIS,
a/k/a "Malvin James Harris," a/k/a "Doo,"**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

COUNT 2

(Assaulting, Resisting, or Impeding a Federal Officer)

On or about August 18, 2019, in Leelanau County, in the Southern Division of the Western District of Michigan, the defendant,

**MELVIN JAMES HARRIS,
a/k/a “Malvin James Harris,” a/k/a “Doo,”**

forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with R.C., a federal law enforcement officer, while R.C. was engaged in the performance of his official duties. In so doing, the defendant engaged in acts involving physical contact with R.C. and inflicted bodily injury on R.C.

18 U.S.C. § 111(a)(1) and (b)

COUNT 3
(Contempt of Court)

Between on or about October 3, 2019, and on or about November 5, 2019, in Newaygo County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

**MELVIN JAMES HARRIS,
a/k/a “Malvin James Harris,” a/k/a “Doo,”**

willfully and intentionally disobeyed a lawful order of a Court of the United States, that is, the protective order issued by Hon. Ellen S. Carmody, United States Magistrate Judge, on September 30, 2019, in the Western District of Michigan in the case *United States v. Melvin James Harris*, Case No. 1:19-CR-209. Specifically, the defendant used and disclosed, and caused and directed others to use and disclose, data tending to reveal the identity and other personal information about Witness 1, for a purpose other than “allowing [him] to prepare [his] defense in this case.”

18 U.S.C. § 401(3)
18 U.S.C. § 2

COUNT 4
(Conspiracy to Witness Tamper)

Between on or about October 5, 2019, and on or about November 10, 2019, in Newaygo County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**MELVIN JAMES HARRIS, a/k/a “Malvin James Harris,” a/k/a “Doo,”
VANESSA LOUISE HUNTER, and
COREY JOHN RAPHAEL,**

conspired with each other and others known and unknown to the grand jury to knowingly use intimidation, threaten, and corruptly persuade another person, and to attempt to do so, with intent to influence, delay, and prevent the testimony of Witness 1 in an official proceeding, and with intent to cause and induce Witness 1 to withhold testimony from an official proceeding. The official proceeding in question was an official proceeding in this case (1:19-CR-209).

18 U.S.C. § 1512(k)

18 U.S.C. § 1512(b)(1) and (b)(2)(A)

18 U.S.C. § 1515(a)(1)(A)

COUNT 5
(Witness Tampering)

Between on or about October 5, 2019, and on or about November 10, 2019, in Newaygo County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendants,

**MELVIN JAMES HARRIS, a/k/a “Malvin James Harris,” a/k/a “Doo,”
VANESSA LOUISE HUNTER, and
COREY JOHN RAPHAEL,**

knowingly used intimidation, threatened, and corruptly persuaded another person, and attempted to do so, with intent to influence, delay, and prevent the testimony of Witness 1 in an official proceeding and with intent to cause and induce Witness 1 to withhold testimony from an official proceeding. Specifically, the defendants engaged in the above conduct using calls, notes, social media messages, posts, and other Facebook activity; and the official proceeding in question was an official proceeding in this case (1:19-CR-209).

18 U.S.C. § 1512(b)(1) and (b)(2)(A)

18 U.S.C. § 1515(a)(1)(A)

18 U.S.C. § 2

COUNT 6
(Perjury)

On or about December 17, 2019, in Kent County, in the Southern Division of the Western District of Michigan, the defendant,

COREY JOHN RAPHAEL,

while under oath and testifying before a Grand Jury for the United States District Court for the Western District of Michigan, knowingly made a false material declaration, in that:

1. At the time and place noted above, the defendant was a witness giving sworn testimony before a Grand Jury during a criminal investigation of possible violations of federal law, in the case of *In Re: Harris*. Whether the defendant had contacted others about Witness 1 was material in the pending Grand Jury investigation.

2. At the time and place alleged, the defendant, appearing as a witness under oath, knowingly made the following declarations in response to questions with respect to the matter alleged, as follows:

Q: Okay. Now, did Vanessa tell you at all that you should try to contact [Witness 1]?

A: No, no. I didn't contact nobody. The only ones that I had contact with was Vanessa and his lawyer. That's it. No one else.

3. The above-noted testimony of the defendant, as he then and there well knew and believed, was false, in that the defendant had, after communicating with Vanessa Louise Hunter, in fact contacted a number of people and revealed to them the name of Witness 1, who Witness 1 was working with, and the methods Witness 1 was using. The defendant then reported back to Vanessa Louise Hunter that "the word is out."

18 U.S.C. § 1623

A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
United States Attorney



SEAN M. LEWIS
Assistant United States Attorney